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**Not for service*

October 4, 2023

BY ECF

Hon. James L. Cott, United States Magistrate Judge
United State District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Casablanca-Torres v. City of New York, et al., 21-cv-10832 (LAK)(JLC)

Your Honor:

I am co-counsel for Plaintiff in the above matter, which is on for a settlement conference next week, October 10, 2023. I now write jointly with opposing counsel to request that the Court extend the deadlines (1) for the parties to submit their *ex parte* letters and the other documents required by Your Honor's prior orders in advance of the conference from tomorrow, October 5, 2023, at 5:00pm, until 5:00pm on Friday, October 6, 2023, and (2) for Defendants to respond to Plaintiff's outstanding settlement demands with offers, until noon on Monday, October 9, 2023. There have been no previous requests to extend these deadlines.

In terms of the need for the request, Defendants had asked that Plaintiff provide a detailed statement outlining the damages and laying out certain proof, which I had hoped to get to defense counsel by last Friday. However, work on the statement went slower than I had anticipated, including because it has involved reviewing, making sense of, and incorporating information from many records relating to investigations arising from the incident that Defendants only recently produced. Additionally, my work on that statement was interrupted by, among other things, conditions arising from last Friday's weather emergency. As a result, I was only able to provide that statement to Defendants today. Moreover, Defendants are still attempting to produce certain Civilian Complaint Review Board ("CCRB") records, which Defendants hope to do today.

The parties make this joint request because we believe the one additional business day will assist Defendants in obtaining settlement authority and will enable both parties to better prepare for the conference and submit the most meaningful *ex parte* submissions.. Under the circumstances, we hope the Court will grant the requested extensions. The parties and counsel thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver